

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

STEPHEN SULLIVAN, WHITE OAK FUND, LP,  
CALIFORNIA STATE TEACHERS'  
RETIREMENT SYSTEM, SONTERRA CAPITAL  
MASTER FUND, LTD., FRONTPOINT  
PARTNERS TRADING FUND, L.P., AND  
FRONTPOINT AUSTRALIAN OPPORTUNITIES  
TRUST on behalf of themselves and all other  
similarly situated,

Plaintiffs

- against -

BARCLAYS PLC, BARCLAYS BANK PLC,  
BARCLAYS CAPITAL INC., CITIGROUP, INC.,  
CITIBANK, N.A., COÖPERATIEVE CENTRALE  
RAIFFEISEN-BOERENLEENBANK B.A.,  
CRÉDIT AGRICOLE, S.A., CRÉDIT AGRICOLE,  
CIB, DEUTSCHE BANK AG, HSBC HOLDINGS  
PLC, HSBC BANK PLC, J.P. MORGAN CHASE  
& CO., J.P. MORGAN CHASE BANK,  
NATIONAL ASSOCIATION, THE ROYAL  
BANK OF SCOTLAND PLC, SOCIÉTÉ  
GÉNÉRALE SA, UBS AG AND JOHN DOE NOS.  
1-50.,

Defendants.

Docket No. 13-cv-02811 (PKC)

**DECLARATION OF PIERRE MINOR IN SUPPORT OF MOTION TO DISMISS  
THE FOURTH AMENDED CLASS ACTION COMPLAINT**

I, Pierre Minor, hereby declare under penalty of perjury as follows:

1. I am the General Counsel and Director of Group Compliance of Crédit Agricole S.A. ("CASA"), located in Montrouge, France.
2. I submit this declaration in support of CASA's Motion to Dismiss for Lack of Personal Jurisdiction in the above-captioned action. The facts stated herein are true and

correct to the best of my knowledge, based on my knowledge gained from my employment at CASA and my review of CASA's corporate records.

3. Except where otherwise indicated, all statements apply to the period from June 1, 2005 to March 31, 2011, and describe the operations only of CASA, and not any separately incorporated and district subsidiary or affiliated entities.

4. CASA is a bank holding company organized under the laws of France as a *Société Anonyme*, with its headquarters and principal place of business since December 2012 located at 12 place des Etats-Unis - 92127 Montrouge Cedex, France and formerly at 91/93 boulevard Pasteur – 75015 Paris.

5. The principal regulators of CASA are the *Autorité de Contrôle Prudential et de Résolution* of the *Banque de France*, the *Autorité des Marchés Financiers* and since November 2014 the European Central Bank.

6. CASA is not licensed by the federal government to conduct banking or any other type of business in the U.S.

7. CASA is not registered to do business in any state of the United States.

8. CASA has no branches or offices in the United States. CASA thus has no representative branch or office in New York City registered with NYSDFS under New York Banking Law §§ 200 and 200-b, as Plaintiffs wrongly allege in Paragraph 45 of the Fourth Amended Complaint.

9. CASA has neither owned nor leased any real estate in the United States.

10. CASA does not have an address or telephone number in the United States.

11. CASA is the parent corporation of Crédit Agricole CIB ("CACIB"). CASA maintains a separate board of directors and a separate corporate existence from CACIB.

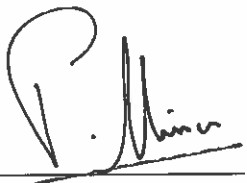
CASA's corporate books and records are maintained separately from CACIB's corporate books and records. CASA also operates and maintains a website:

<http://www.credit-agricole.com> that is separately maintained from the website of CACIB.

12. CASA's contributions to the EURIBOR panel were determined and submitted in Courbevoie, France. The employees who were responsible for and involved in determining and submitting CASA's EURIBOR contribution were employed in Courbevoie, France. None of these employees was either employed or located in the United States.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 13<sup>th</sup> day of October, 2015 in Montrouge, France.

  
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PIERRE MINOR